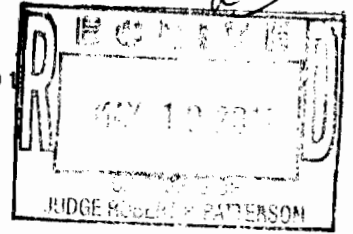


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LAW OFFICES
KRAVET & VOGEL, LLP
1040 AVENUE OF THE AMERICAS, SUITE 1101
NEW YORK, NEW YORK 10018-3703
TELEPHONE: (212) 997-7634
FACSIMILE: (212) 997-7686
www.kravetvogel.com
WRITER'S E-MAIL: jvogel@kvnyc.com



DONALD J. KRAVET
JOSEPH A. VOGEL

MARIA E. RODI

OF COUNSEL:
HOWARD J. AUGUST
SCOTT H. GREENFIELD

May 9, 2011

BY HAND

Hon. Robert P. Patterson
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *Cacoperdo v. Hartford Life Ins. Co., MLS National Medical Evaluations, Inc. and Medical Evaluation Specialists, Inc. d/b/a MES Solutions*
Case No. 1:10-cv-07847-RPP

Dear Judge Patterson:

We represent Defendant MLS National Medical Evaluation Services, Inc. ("MLS") in the above-referenced action. We write with the consent of all parties in the above-referenced action to respectfully request that MLS's time to respond to the plaintiff's Amended Complaint be extended nunc pro tunc through today and that the enclosed concurrence by MLS to the motion to dismiss filed by defendant Medical Evaluation Specialists, Inc. ("MES") and MLS's request to join in the relief requested by MES be deemed timely filed.

As this Court may recall, Michigan counsel for MLS, Williams Acosta, PLLC, struggled to secure local counsel to enter MLS's reply to Plaintiff's Amended Complaint. On that basis, on April 1, 2011, this Court first granted an extension of MLS's reply deadline to April 18, 2011. When Michigan counsel still could not secure local counsel on that date on account of delay caused by conflict checks, this Court declined to extend MLS's reply deadline again, and issued on April 18, 2011 at Docket No. 17 an endorsement stating: "Defendant can file an answer to the Amended Complaint without lead counsel being knowledgeable about the case."

In fact, MLS still had not secured local counsel at that time, so no reply could be filed with the Court on that date. In an effort to sustain the proceedings, through its Michigan counsel, MLS submitted to this Court and served on all parties its Answer and Affirmative Defenses. This Court did not accept nor did it enter that filing into the docket.

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The results of the aforementioned conflict check were unfavorable, and MLS was forced to search anew for local counsel. Of course, this further delayed MLS's ability to reply to the Amended Complaint. Now, Michigan counsel has associated with and MLS is represented locally by Kravet & Vogel, LLP.

MLS therefore respectfully requests this Court to extend the time for MLS to respond to plaintiff's Amended Complaint nunc pro tunc through today and to deem the enclosed concurrence and request to join in the relief requested by MES (filed today via ECF), by which MLS also seeks dismissal of the Amended Complaint, be deemed timely filed. MLS has conferred with counsel for all parties in this case and all have consented to this request to extend MLS's time to respond to the Amended Complaint and agree that such an order would not prejudice the proceedings.

Because MLS's filing moves to join in the relief requested by MES' Motion to Dismiss, there is no danger of prejudice to the nonmoving parties. Instead, MLS's concurrence now makes these proceedings more efficient and manageable. Plaintiff is already on notice of MES's Motion, and this Court has already granted Plaintiff's request to extend the time to respond to that motion. Plaintiff may now jointly respond to MES and MLS. MLS's struggle to secure local counsel caused the delay in its reply, and MLS has acted in good faith to participate timely in the proceedings. Any delays are highly regrettable, but excusable given MLS's good faith efforts and the turn the proceedings have taken.

Thank you very much, Your Honor.

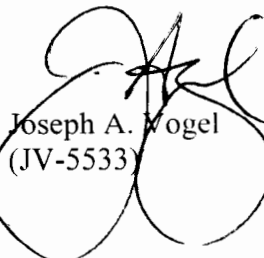
Respectfully submitted,

WILLIAMS ACOSTA, PLLC



Avery K. Williams
(*Pro hac vice* admission to be requested)

KRAVET & VOGEL, LLP



Joseph A. Vogel
(JV-5533)

cc: Jason Newfield, Esq. (via e-mail)
Justin Corey Frankel, Esq. (via e-mail)
Michael H. Bernstein, Esq. (via e-mail)
Elizabeth Richer Chesler, Esq. (via e-mail)
Andrew I. Hamelsky, Esq. (via e-mail)

*Application granted
as ordered
- Patrick Tattenberg
5/10/11*